

UNITED STATES DISTRICT COURT FOR  
EASTERN DISTRICT OF NEW YORK

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MONADNOCK CONSTRUCTION, INC.,  
Plaintiff,

Case No.: 16 CIV 00420 (JBW)(VMS)  
ECF Case

-against-

WESTCHESTER FIRE INSURANCE  
COMPANY,  
Defendant.

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WESTCHESTER FIRE INSURANCE  
COMPANY,  
Third-Party Plaintiff,  
-against-

GLASSWALL, LLC, UGO COLOMBO, and  
SARA JAYNE KENNEDY COLOMBO,  
Third-Party Defendants.

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**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Evan Weintraub, Esq. sworn to on May 11, 2018, together with the exhibits annexed thereto, and the accompanying Memorandum of Law, and all of the prior pleadings and proceedings in this action, Plaintiff Monadnock Construction, Inc., through its undersigned counsel, will move this Court, before the Honorable Magistrate Judge Vera M. Scanlon, at the United States Courthouse, United States District Court, Eastern District of New York, 225 Cadman Plaza, East, Brooklyn, New York, on a date and time to be designated by the Court, for an Order pursuant to Rules 26, 45, and 69 of the Federal Rules of Civil Procedure compelling Westchester Fire Insurance Company, Ugo Colombo, Sara Jayne Kennedy Colombo, and Tecnoglass, LLC to (a) produce documents responsive to the categories set forth in Exhibit A to the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of a Premises in a Civil Action, served upon each of them; and (b) to make themselves available for deposition concerning the matters identified the Subpoena to Testify at a Deposition in a Civil Action.

Dated: New York, New York  
May 11, 2018

Respectfully submitted,

WACHTEL MISSRY LLP

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